

EXHIBIT B

From: [Aycock, Jamie](#)
To: [Kyle Bates](#); [Maradiaga, Karla](#); [Bracewell, Mollie](#)
Cc: [Zeke DeRose](#); [Trevor Young](#); [Camila Ringeling](#)
Subject: RE: Texas et al. v. Google | Puerto Rico
Date: Monday, March 25, 2024 1:20:37 PM
Attachments: [image001.png](#)
[image002.png](#)

Kyle,

While we appreciate that you did speak with us, you repeatedly told us that you stood on your objections and were not willing to further discuss the issues we raised.

Again, we are interested in how Puerto Rico determined to only speak with one person regarding our ad tech related RFPs and why that one person. We are entitled to an explanation for why Puerto Rico only took these extremely limited efforts but you said you would not provide further information about these issues.

We are also interested in whether Puerto Rico conducted any investigation related to the claims in this case and are seeking third party communications related to any such investigation. You said you would not answer those questions, however, even though any communications with a third party obviously would not be privileged.

The other states in this case have recognized these are legitimate questions and have cooperated with us. We will raise these issues with the special master again but are hopeful that Puerto Rico will agree to provide this information without the need for his involvement.

Regards,
Jamie

Jamie Alan Aycock | Partner | Yetter Coleman LLP

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From: Kyle Bates <kbates@hausfeld.com>

Sent: Monday, March 25, 2024 1:08 PM

To: Maradiaga, Karla <kmaradiaga@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; Aycock, Jamie <jamieaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.deros@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>

Subject: RE: Texas et al. v. Google | Puerto Rico

Hi Karla,

Thanks for your time last week and for your e-mail this morning. I can confirm that I am checking with my client to 1) confirm that Puerto Rico does not, as stated in our RFP responses, have any chat retention policies responsive to RFP 46 and 2) confirm that Puerto Rico's response to RFP No. 7 remains accurate.

We disagree with the rest of your characterization of our call, particularly your repeated assertions that Puerto Rico has refused to answer your questions about Puerto Rico's search methodology. Puerto Rico has described its search for documents in prior correspondence and is, along with the other States, continuing to meet and confer with Google about its 30(b)(6) notices to the States which include several topics about the States' document collection and retention efforts. We met and conferred with Google and counsel for the other States on that deposition notice early last week, and separately offered to meet with you all to discuss Puerto Rico's document collection and preservation efforts before last week's hearing with the Special Master. Your e-mail correctly notes that we did so the day after the hearing. And while we want to continue working in good faith to move the discovery process forward, Puerto Rico has valid objections to Google's written discovery requests that limit the scope of its responses and Google's inquiry. For example, your request for pre-suit communications between Puerto Rico and third parties implicates privileged communications between the States, and such communications are privileged from disclosure. Furthermore, and in any event, Google is not entitled to demand that Puerto Rico justify to Google why it took the steps it did to collect documents nor is Puerto Rico required to agree with Google's position that those efforts were insufficient.

Best,
Kyle

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From: Maradiaga, Karla <kmaradiaga@yettercoleman.com>

Sent: Monday, March 25, 2024 10:30 AM

To: Kyle Bates <kbates@hausfeld.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>;

Aycock, Jamie <jamieaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.deros@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>

Subject: RE: Texas et al. v. Google | Puerto Rico

Hi Kyle,

I'm writing to follow up on and memorialize our Friday call about Puerto Rico's search methodology and document production as the Special Master directed. We asked you to clarify (1) how Puerto Rico searched for consumer complaints given that an electronic database is not maintained, and there is no indication of a search of physical files (2) why the investigation into Puerto Rico's use of Ad Tech or Display Advertising was limited to speaking to one person and (3) whether Puerto Rico has responsive document and chat retention policies.

We appreciate that you clarified that Puerto Rico does not have any retention policies that would apply to documents requested in our RFPs, not just responsive documents that you have located. We appreciate that you are following up regarding whether Puerto Rico has any document retention policies that apply to chats (RFP No. 46). But otherwise, you said that Puerto Rico is standing on its latest objections to Google's RFPs and declined to answer our questions. You also said that you would look into whether you can confirm that there are no responsive documents for RFP No. 7, which is related to damages/injury including to general welfare. The fact that you are not providing answers to our questions about Puerto Rico's search methodology, however, limits the usefulness of your responses. In any event, we would appreciate prompt follow up on the couple of issues you agreed to look into.

As we said on the call, refusing to answer our basic questions about Puerto Rico's search methodology is contrary to the direction the Special Master provided at the conference last week and we intend to raise this with him.

Regards,
Karla

From: Kyle Bates <kbates@hausfeld.com>

Sent: Friday, March 22, 2024 11:31 AM

To: Maradiaga, Karla <kmaradiaga@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; Aycock, Jamie <jamieaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.deros@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>

Subject: RE: Texas et al. v. Google | Puerto Rico

Let's do 2:30 today. Thanks very much.

Best,
Kyle

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From: Maradiaga, Karla <kmaradiaga@yettercoleman.com>

Sent: Friday, March 22, 2024 12:21 PM

To: Kyle Bates <kbates@hausfeld.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; Aycock, Jamie <jamielaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.derosé@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>

Subject: RE: Texas et al. v. Google | Puerto Rico

Thanks Kyle. Are you available at 1:30pm CT/2:30 pm ET or between 3-4pm CT/ 4-5pm ET today? Let me know and I will send a Teams invite for a 30-minute meeting.

Regards,

Karla

From: Kyle Bates <kbates@hausfeld.com>

Sent: Thursday, March 21, 2024 7:40 PM

To: Bracewell, Mollie <mbracewell@yettercoleman.com>; Aycock, Jamie <jamielaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.derosé@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>; Maradiaga, Karla <kmaradiaga@yettercoleman.com>

Subject: RE: Texas et al. v. Google | Puerto Rico

Thanks Mollie. I understand that the Special Master today instructed me, as counsel for Puerto Rico, to reach out to you all about these issues immediately. As I said, I'm happy to discuss these issues. if you feel it would be productive to do so please let me know some dates/times that you all would be available.

Best,

Kyle

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From: Bracewell, Mollie <mbracewell@yettercoleman.com>

Sent: Thursday, March 21, 2024 9:40 AM

To: Kyle Bates <kbates@hausfeld.com>; Aycock, Jamie <jamieaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.derosé@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>; Maradiaga, Karla <kmaradiaga@yettercoleman.com>

Subject: Re: Texas et al. v. Google | Puerto Rico

Thanks Kyle. I am copying Karla Maradiaga from our team, who has been handling these state meet and confers, and who had reached out about conferring.

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From: Kyle Bates <kbates@hausfeld.com>

Sent: Thursday, March 21, 2024 8:32 AM

To: Bracewell, Mollie <mbracewell@yettercoleman.com>; Aycock, Jamie <jamieaycock@yettercoleman.com>

Cc: Zeke DeRose <zeke.derosé@lanierlawfirm.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Camila Ringeling <cringeling@hausfeld.com>

Subject: Texas et al. v. Google | Puerto Rico

Good morning Mollie and Jamie,

I wanted to be sure I had clarified Puerto Rico's position on its document production in advance of the hearings today before Judge Jordan and the Special Master. For clarity, Puerto Rico is willing to meet and confer on these topics (and any others) at Google's convenience.

Additionally, and with respect to Puerto Rico's document retention policies, I wanted to make sure

we weren't talking past each other. Puerto Rico as a state government may have document retention policies that cover entirely irrelevant categories of documents it may keep, such as criminal records for state prisoners or health records for individuals treated at state facilities. I don't know whether that is the case and we have not undertaken any investigation as to those kinds of policies, they are just examples that occurred to me. That said, we **did** conduct an investigation as to whether Puerto Rico had any documents responsive to Google's requests generally, and as set forth in our responses to those requests Puerto Rico does not. A driving force for that is that Puerto Rico does not purchase or use display ads. So, Puerto Rico does not have any document retention policies that do or could possibly apply to any potentially responsive documents, so we not only have no documents to produce but not retention policies responsive to Google's requests for such policies. That seems straightforward to me but as I'm writing it perhaps it isn't...happy to discuss further if that would be helpful.

Best,
Kyle

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